UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

RHONDA HALL,) CIVIL ACTION NO. 05-30002-MAF
Plaintiff)
v.))
VERIZON COMMUNICATIONS, INC., and VERIZON NEW ENGLAND, INC.))) MAY 27, 2005
Defendants)))

MOTION TO ADMIT VICTORIA WOODIN CHAVEY PRO HAC VICE

Pursuant to Local Rule 83.5.3(b), Defendant Verizon Communications, Inc. ("Verizon") by and through its counsel, respectfully moves this Court to admit Victoria Woodin Chavey, Esquire, <u>pro hac vice</u> as counsel for Verizon in the above-captioned matter. The grounds for this motion are as follows:

- 1. Ms. Chavey is a member in good standing of every bar in which she has been admitted to practice. (See Affidavit of Victoria Woodin Chavey ("Chavey Aff."), at \P 2).
- 2. Ms. Chavey has been admitted to practice before the Courts of the State of Connecticut, the United States District Court for the District of Connecticut and the Southern District of New York, and the United States Courts of Appeals for the First and Second Circuits. (Chavey Aff. at ¶ 2.)
- 3. There are no disciplinary proceedings pending against Ms. Chavey as a member of the bar of any jurisdiction. (Chavey Aff. at ¶ 3).

- 4. Ms. Chavey is familiar with the local rules of this Court and the Federal Rules of Civil Procedure. (Chavey Aff. at ¶ 4)
- 5. Ms. Chavey is familiar with Verizon and the issues in this lawsuit. Ms. Chavey's appearance and participation in this matter in conjunction with other attorneys from Day, Berry & Howard LLP are necessary for the proper and effective representation of Verizon. (Chavey Aff. at $\P 5$
- 6. This motion is made by a member of the bar of this Court who has made an appearance in this matter.

WHEREFORE, Verizon, by and through its counsel, moves this Court to admit Victoria Woodin Chavey pro hac vice in this litigation.

Respectfully submitted,

/s/ Stacy Smith Walsh Stacy Smith Walsh (BBO No. 647420) DAY, BERRY & HOWARD, LLP CityPlace I, 185 Asylum Street Hartford, CT 06103-3499 (860) 275-0100 (860) 275-0343 facsimile sswalsh@dbh.com

CERTIFICATE OF SERVICE

I, Stacy Smith Walsh, hereby certify that on the 27th day of May, 2005, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to Hugh D. Heisler, Esq., of Heisler, Feldman & McCormick, P.C., 1145 Main Street, Suite 508, Springfield, MA 01103.

> /s/ Stacy Smith Walsh Stacy Smith Walsh

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

RHONDA HALL,

Plaintiff,

v. : CIVIL ACTION NO. 05-30002MAP

VERIZON COMMUNICATIONS, INC. and VERIZON NEW ENGLAND, INC.,

,

Defendants.

AFFIDAVIT OF VICTORIA WOODIN CHAVEY

- I, Victoria Woodin Chavey, hereby depose and say as follows:
- 1. I am a partner in the law firm of Day, Berry & Howard LLP, CityPlace I, Hartford, Connecticut, 06103.
- 2. I am in good standing in every jurisdiction in which I have been admitted to practice. I am a member of the bar of the State of Connecticut. I have also been admitted to the bar of the United States District Court for the District of Connecticut and the Southern District of New York, as well as the United States Courts of Appeals for the First and Second Circuits.
- 3. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
- 4. I am familiar with the Federal Rules of Civil Procedure and the rules for practice before the United States District Court for the District of Massachusetts.
- 5. I am familiar with Verizon Communications, Inc. and Verizon New England, Inc. ("Verizon") and the issues in this lawsuit. My appearance and participation in conjunction with

other attorneys from Day, Berry & Howard LLP are necessary for the proper and effective representation of Verizon in this matter.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS **26** DAY OF MAY, 2005.

Victoria Woodin Chavey